

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MASSACHUSETTS**

MARIA ALEJANDRA CELIMEN SAVINO,  
JULIO CESAR MEDEIROS NEVES, and all  
those similarly situated,

Petitioners-Plaintiffs,

v.

STEVEN J. SOUZA,

Respondent-Defendant.

Case No. 1:20-cv-10617 WGY

**DECLARATION OF OREN SELLSTROM IN SUPPORT OF PLAINTIFFS' MOTION  
FOR PRELIMINARY INJUNCTION**

I, Oren Sellstrom, hereby declare as follows:

1. I am the Litigation Director at the Lawyers for Civil Rights Boston, counsel for Plaintiffs in the above captioned matter. I am licensed to practice law in the Commonwealth of Massachusetts and am admitted to practice before this Court.

2. I make this declaration in support of Plaintiffs' Motion for a Preliminary Injunction.

3. Attached hereto as Exhibit A is a true and correct copy of Plaintiffs' Notice of Rule 30(b)(6) Deposition of Bristol [County] House of Corrections, served on Defendants on April 26, 2020.

4. Attached hereto as Exhibit B is a true and correct excerpted copy of the rough transcript of the April 30, 2020 Deposition of Nelly Floriano.

5. Attached hereto as Exhibit C is a true and correct excerpted copy of the rough transcript of the May 5, 2020 deposition of Sheriff Thomas Hodgson.

6. Attached hereto as Exhibit D is a true and correct excerpted copy of the transcript of the May 1, 2020 deposition of Superintendent Steven Souza.

I declare under penalty and perjury of law that the foregoing is true and correct to the best of my knowledge.

Executed this 6<sup>th</sup> day of May, 2020, in Boston, Massachusetts.

/s/ Oren Sellstrom  
Oren Sellstrom (BBO #569045)  
Lawyers for Civil Rights  
61 Batterymarch Street, 5th Floor  
Boston, MA 02110  
(617) 988-0606  
onimni@lawyersforcivilrights.org

Dated: May 6, 2020

CERTIFICATE OF SERVICE

I, Oren Sellstrom, hereby certify that a true and accurate copy of this document was served via ECF to all registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as nonregistered participants on May 6, 2020.